

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

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Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS DAVID E. WILLIAMS  
(APWU/USPS-T1-21-30)  
(February 17, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness David E. Williams (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T1-21 USPS-LR-N2012-1/57 provides a list of 487 facilities that is described as being the network as of September 15, 2011.

- a) Is this the Postal Service mail processing facility listing as of that date?
- b) If not, what network does it represent?
- c) How does this list differ from the frequently used number of 461 facilities in today's network?

APWU/USPS-T1-22 There are 21 NDC's listed on USPS-LR-N2012-1/57.

- a) Which mail processing functions currently take place in these locations?
- b) Which NDCs currently have FSS machines installed in them?
- c) Please refer to the December 27, 2011 AMP Feasibility Study (summary) for Southern CT (Wallingford) P&DC. That AMP study summary indicates that it would not be possible to move all mail processing operations into the Hartford P&DC but the business case exists for moving the letter volume to Hartford and the flat and parcel volume to the Springfield NDC. Would this require new mail processing operations be performed at that NDC which are not currently performed there?
- d) Under the proposed network rationalization plan, would NDCs take on more mail processing functions than in the current network?

APWU/USPS-T1-23 USPS-LR-N2012-1/6 provides a list of mail processing facilities being studied for consolidation opportunities.

- a) Please confirm that there are 14 sites on that list that do not require AMPs because they are contractor-operated sites or are sites that do not contain mail processing operations. What is the estimated savings amount obtained from this group of facilities?
- b) Please confirm that there are 38 sites on that list that do not require a formal AMP but do require public comment. What is the process for those public comments to be collected? What is the estimated savings amount obtained from this group of facilities?
- c) What factors determine when a CSMPC requires an AMP and when it does not require an AMP?
- d) Please confirm there are 186 sites on that list for which AMPs have been conducted under this initiative and public meetings held.
- e) Please provide the date by which the AMP documentation will be submitted to the PRC. Will those be available before the close of discovery on February 24?
- f) Please provide the current status of the following sites on that list that do not seem to fit into any of the above groups: Boston, MA P&DC; Burlington, VT P&DF; Detroit, MI P&DC; Grand Forks, ND CSMPC; Irving Park, IL P&DC; Manasota, FL P&DC; Manchester, NH P&DC; North Platte, NE CSMPC; Rapid

City, SD P&DF; San Bernardino, CA P&DC; South Jersey P&DC; and Western Nassau, NY P&DC.

- g) Please confirm that several of these facilities are gaining facilities with respect to the AMPs mentioned in (c ) above.
- h) Will AMP-related public hearings be conducted at any of these sites in relation to this proposal? If so, within what time frame?

APWU/USPS-T1-24 There are four sites that do not appear on USPS-LR-N2012-1/6 but which have undergone the AMP process within the time period of this study.

- a) Please confirm that Mid-Florida P&DC, Owensboro, KY CSMPC, Staten Island P&DF and Washington, PA CSMPC have been added to the study list for this initiative.
- b) What factors caused these particular sites to be added?

APWU/USPS-T1-25 A recent webinar by the PMG entitled “USPS Financial Future Responsibly Realigning Our Network” presents a timeline on page 12. The timeline indicates that AMP decisions will be complete by the end of February. How does February 23<sup>rd</sup> fit into this timeline?

APWU/USPS-T1-26 On page 5 of the webinar presentation mentioned in the question above, there is a notation that the realignment of the network will reduce annual operating costs by \$2.6 billion.

- a) Does this \$2.6 billion estimate come from the cost savings estimates produced by witness Smith and witness Bradley in this case?
- b) Do you consider the cost savings estimates that are produced by the AMP process to be more accurate?
- c) Are there any major areas of cost savings that the AMPs do not capture? If so, which ones are they?
- d) The cost savings estimates from the 186 AMP summaries mentioned in APUW-USPS-T1-23 (c ) total to number that is substantially less than \$2.6 billion. Has your staff analyzed the differences between these two estimates? Is so, please provide that analysis.

APWU/USPS-T1-27 On page 10 of the aforementioned webinar, there is an example of proposed area hubs.

- a) Under what sets of circumstances will these hubs operate?
- b) What activities will take place at these hubs?

- c) Have the costs of running these hubs been included in the cost estimates presented by witnesses Smith and Bradley?
- d) Will these hubs be located in facilities that no longer contain mail processing activities but do contain retail units and BMEU?

APWU/USPS-T1-28 One page 6 of the aforementioned webinar presentation, it states that BMEU will not change in the near term.

- a) Please define "near term" in this context?
- b) Some AMP summaries indicate that business mail acceptance may move to another local office (for example, see the summaries for Asheville, NC November 16, 2011 revised, Beaumont, TX December 19, 2011, Brockton, MA December 23, 2011, Cincinnati, OH November 14, 2011, Columbus, GA October 21, 2011.) Will these moves only take place after "the near term"?
- c) What factors determine whether or not a BMEU will remain at the facility or be moved?

APWU/USPS-T1-29 What changes are expected in the service standards of First Class Parcels under the proposed plan?

APWU/USPS-T1-30 There are approximately 60 AMPs that were approved prior to this initiative that have not been officially tagged as "implemented" on the Postal Service's AMP tracking page. [About.usps.com/streamlining-operations/area-mail-processing.htm](http://About.usps.com/streamlining-operations/area-mail-processing.htm)

- a) Are any of the AMPs listed as "Approved" on the Postal Service's AMP tracking page now officially "Implemented"? If so which ones.
- b) In how many of the facilities listed as "Approved" are mail processing operations currently taking place?
- c) In how many of the facilities listed as "Approved" are employees being transported to a different facility to process the mail?